

# **EXHIBIT D**

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15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT  
17  
18 NORTHERN DISTRICT OF CALIFORNIA  
19  
20 SAN FRANCISCO DIVISION

21 **In re: CATHODE RAY TUBE (CRT)**  
22 **ANTITRUST LITIGATION**

23 This Document Relates to:  
24 ALL ACTIONS

Case No. 07-cv-05944 SC

MDL No. 1917

**DEPOSITION NOTICE OF DIDIER TRUTT PURSUANT TO FED. R. CIV. P. 30**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil  
 3 Procedure, the Direct Action Plaintiffs and the Direct Purchaser Plaintiffs (collectively  
 4 "Plaintiffs") will take the deposition of **DIDIER TRUTT**. The deposition will occur on  
 5 **September 2-3, 2014, at 9:00 a.m.** at the offices of Taylor & Company Law Offices, LLP, One  
 6 Ferry Building, Suite 355, San Francisco, CA 94111. The deposition shall continue from day to  
 7 day (including weekends) until recessed or completed.

8 The deposition will be taken before a notary public or other person authorized to  
 9 administer oaths under applicable law, and will be conducted pursuant to Rule 30 of the Federal  
 10 Rules of Civil Procedure. Plaintiffs intend and reserve the right to record the deposition  
 11 testimony of the above-identified deponent by videotape and instant visual display, in addition to  
 12 recording the testimony stenographically and by LiveNote/realtime. Plaintiffs reserve the right  
 13 to use the videotape deposition at time of trial.

14  
 15 Dated: August 8, 2014

Respectfully Submitted,

16 /s/ Craig A. Benson

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18 Joseph J. Simons (*pro hac vice*)

19 Craig A. Benson (*pro hac vice*)

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MDL No. 1917

**DEPOSITION NOTICE OF AGNES  
MARTIN PURSUANT TO FED. R.  
CIV. P. 30**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil  
 3 Procedure, the Direct Action Plaintiffs and the Direct Purchaser Plaintiffs (collectively  
 4 "Plaintiffs") will take the deposition of **AGNES MARTIN**. The deposition will occur on  
 5 **September 2-3, 2014, at 9:00 a.m.** at the offices of Taylor & Company Law Offices, LLP, One  
 6 Ferry Building, Suite 355, San Francisco, CA 94111. The deposition shall continue from day to  
 7 day (including weekends) until recessed or completed.

8 The deposition will be taken before a notary public or other person authorized to  
 9 administer oaths under applicable law, and will be conducted pursuant to Rule 30 of the Federal  
 10 Rules of Civil Procedure. Plaintiffs intend and reserve the right to record the deposition  
 11 testimony of the above-identified deponent by videotape and instant visual display, in addition to  
 12 recording the testimony stenographically and by LiveNote/realtime. Plaintiffs reserve the right  
 13 to use the videotape deposition at time of trial.

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 15 Dated: August 8, 2014

Respectfully Submitted,

16 /s/ Craig A. Benson

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